

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
Charles Mintz	:	CHAPTER 13
Debtor	:	
	:	No. 15-17168-elf

**ANSWER TO MOTION OF NATIONSTAR MORTGAGE, LLC FOR RELIEF FROM
AUTOMATIC STAY**

Debtor, by his attorney, Erik B. Jensen, Esq. by way of answer to Movant's motion, respectfully represents that:

1. Admitted.
2. Denied. Legal conclusion.
3. Denied. Legal conclusion.
4. Denied. Legal conclusion.
5. Denied. Legal conclusion.
- 6-7 Denied. Legal conclusion. Specifically denied that Debtor has failed to maintain taxes and insurance. Strict proof is demanded at time of hearing, if relevant. Furthermore, specifically denied that Debtor is in default.
8. Denied. Legal conclusion.
9. Denied. Legal conclusion.
10. Admitted.
11. Denied. Legal conclusion. By way of further response, this averment is denied for reasons states above.
12. Denied. Legal conclusion.
13. Denied. Legal conclusion.
14. Denied. Legal conclusion
15. Denied. Legal conclusion
16. Denied. Legal conclusion

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

Date: 12/14/18

Respectfully submitted.

/S/ Erik B. Jensen
Erik B. Jensen, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer to Motion for Relief was served on December 14, 2018, on the Chapter 13 Standing Trustee, William C. Miller, Esquire and Kevin Buttery, Esquire by electronic mail.

Date: 12/14/18

/s/ Erik B. Jensen
Erick B. Jensen, Esq.
Attorney for Debtor